

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),
et al.,

Debtors.

Chapter 11

Case No. 02-12152 (CGC)

(Jointly Administered)

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),
et al.,

Plaintiffs-Counterclaim Defendants-Appellees.

03-A-54271

v.

JAEBAN (U.K.) LIMITED, *et al.*,

Defendant, and

IBRAHIEM JAEBAN,

Defendant-Counterclaim Plaintiff-Appellant.

**PLAINTIFFS-APPELLEES' COUNTERDESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Plaintiffs-Appellees BRAC Group, Inc., *et al.*,¹ by their undersigned counsel,

¹ Although this appeal only concerns Budget Rent-A-Car International, Inc. ("BRACII") as Appellee, Defendant-Appellant's Notice of Appeal appears to treat all Debtors in Case No. 02-12152 as Appellees. These Debtors include: BRAC Group, Inc., Auto Rental Systems, Inc., BGI Airport Parking, Inc., BGI Shared Services, Inc., BGI Shared Services, LLC, BRAC Credit Corporation, BRAC Car Sales, Inc., BRAC Fleet Finance Corporation, BRAC Rent A Car Asia-Pacific, Inc., BRAC Rent A Car Caribe Corporation, BRAC Rent A Car Corporation, BRAC Rent A Car of Japan, Inc., BRAC Rent-A-Car of St. Louis, Inc., BRAC Rent-A-Car of the Midwest, Inc., BRAC Rent-A-Car Systems, Inc., BRAC Sales Corporation, BRAC Storage Corporation, BRAT Move Management, Inc., BRAT Relocation Services, Inc., BRAT TRS, Inc., BVM, Inc., Carson Chrysler Plymouth Dodge Jeep Eagle, Inc., Control Risk Corporation, Dayton Auto Lease Company, Inc., Directors Row Management Company, LLC, IN Motors VI, LLC, Mastering The Move Realty, Inc., Mosiant Car Sales, Inc., NYRAC Inc., Paul West Ford, Inc., Philips Jacobs Insurance Agency, Inc., Premier Car Rental LLC, Reservation Services, Inc., TCS Properties, LLC, Team Car Sales of Charlotte, Inc., Team Car Sales of Dayton, Inc., Team Car Sales of Philadelphia, Inc., Team Car Sales of Richmond, Inc., Team Car Sales of San Diego, Inc., Team Car Sales of Southern California, Inc., Team Fleet Services Corporation, Team Holdings Corp., Team Realty Services, Inc., The Move Shop, Inc., Transportation and Storage Associates, ValCar Rental Car Sales, Inc., Vehicle Rental Access Company, LLC, and Warren Wooten Ford, Inc.

pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, hereby counterdesignate the following additional items to be included in the record on appeal in response to Defendant-Appellant Ibrahiem Jaeban's Designation of Items to Be Included in the Record on Appeal (Docket No. 86):

COUNTERDESIGNATIONS

Filing Date	Docket #	Docket Text
09/09/2003	9	Pre-Trial Scheduling Order Signed on 9/9/2003
12/09/2003	17	Motion to Amend -- Plaintiffs' and Plaintiffs' Intervenor's Motion for a Revised Pre-Trial Schedule in Light of Defendant's U.K. Administrative Receivership Filed by BRAC Group, Inc. (f/k/a Budget Group, Inc.), Official Committee of Unsecured Creditors
12/17/2003	19	Pre-Trial Scheduling Order (Revised)
01/07/2004	22	Motion to Withdraw as Attorney -- Motion to Withdraw as counsel for defendant Jaeban (UK), Ltd. -- terminating Thomas W. Briggs Filed by Morris Nichols Arsht & Tunnell, together with all attachments
01/16/2004	24	Motion For Summary Judgment (Partial) and Turnover of 327,944.09 Admitted to be Owed Plaintiffs in Light of Defendant's U.K. Administrative Receivership Filed by BRAC Group, Inc., together with all attachments
01/21/2004	25	Notice of Service of Discovery (Plaintiffs' Objections and Responses to Defendant's First Request for Production of Documents) Filed by BRAC Group, Inc.
02/04/2004	29	Order Granting Partial Summary Judgment and Compelling Turnover of Sums Admitted To Be Owed Plaintiffs in Light of Defendant's U.K. Administrative Receivership

07/01/2004	36	Certification of Counsel Regarding Revised Pre-Trial Scheduling Order Filed by BRAC Group, Inc., together with all attachments
07/09/2004	37	Reply in Support of BRACII's Motions for Partial Reconsideration and a Four-Day Extension of Time Filed by BRAC Group, Inc., together with all attachments
07/16/2004	39	Motion to Strike Jaeban UK's Answer and Affirmative Defenses and for Entry of a Default Judgment (Renewed Motion) Filed by BRAC Group, Inc., together with all attachments
08/25/2004	48	Motion for Leave to File a Short Further Submission in Support of Its Motion for Partial Reconsideration in Light of a Newly-Produced Document Filed by BRAC Group, Inc., together with all attachments
09/03/2004	52	Objection(to Mr. Jaeban's Motion to Extend Deadlines in Revised Pre-Trial Scheduling Order Filed by BRAC Group, Inc., together with all attachments
09/14/2004	55	Memorandum Opinion
09/15/2004	59	Motion to Compel and for Leave to File a Two-Item Subpoena on HSBC Bank PLC Filed by BRAC Group, Inc., together with all attachments
09/20/2004	68	Affidavit of Phillip Taylor
10/07/2004	69	Response to BRACII's Motion to Compel and for Leave to File a Two-Item Subpoena on HSBC Bank plc filed by Ibrahiem Jaeban, together with all attachments
10/14/2004	71	Reply in Support of Its Motion to Compel and for Leave to File a Two-Item Subpoena on HSBC Bank PLC, together with all attachments

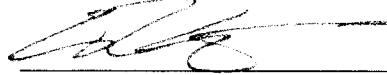
Dated: March 30, 2005

Respectfully submitted,

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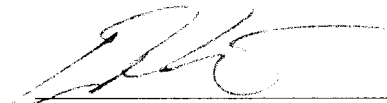
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CERTIFICATE OF SERVICE

I, Edmon L. Morton, Esquire, hereby certify that I am not less than 18 years of age, and that on March 30, 2005, I caused a copy of the foregoing to be served upon the parties identified on the attached service list in the manner indicated thereon.

Date: March 30, 2005

A handwritten signature in black ink, appearing to read 'E. Morton', is written over a horizontal line.

Edmon L. Morton (No. 3856)

**SERVICE LIST
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